

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

STEVEN E. GREER, M.D., )  
)  
Plaintiff, )  
)  
vs. ) 15CIV.6119  
) (AJN) (JLC)  
DENNIS MEHIEL; ROBERT SERPICO; THE )  
BATTERY PARK CITY AUTHORITY; HOWARD )  
MILSTEIN; STEVEN ROSSI; JANET )  
MARTIN; MILFORD MANAGEMENT, a New )  
York Corporation; and MARINERS COVE )  
SITE B ASSOCIATES, )  
)  
Defendants. )  
-----)

DEPOSITION OF ALLYSON FORD  
New York, New York  
Wednesday, April 12, 2017

Reported by:  
Philip Rizzuti  
JOB NO. 122010

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April 12, 2017  
1:04 p.m.

Deposition of ALLYSON FORD, held  
at the United States District Court,  
Southern District of New York, 500  
Pearl Street, New York, New York,  
pursuant to subpoena, before Philip  
Rizzuti, a Notary Public of the State  
of New York

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# A P P E A R A N C E S:

STEVEN E. GREER, Pro Se  
4674 Tatersall Court  
Columbus, Ohio 43230

SHER TREMONTE, LLP  
Attorneys for Defendants Robert Serpico  
and Battery Park City Authority  
90 Broad Street, 23rd Floor  
New York, New York 10004  
BY: MICHAEL TREMONTE, ESQ.  
MICHAEL W. GIBALDI, ESQ.

ROSENBERG & ESTIS  
Attorneys for Defendants Milstein,  
Rossi, Martin, Milford, and Mariners  
Cove  
733 Third Avenue  
New York, New York 10017  
BY: DEBORAH RIEGEL, ESQ.

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# A P P E A R A N C E S:

ABBY GOLDENBERG, ESQ.  
Special Counsel and Risk Officer  
Battery Park City Authority  
200 Liberty Street  
New York, New York 10281

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Ford  
A L L Y S O N F O R D, called as a witness,  
having been duly sworn by a Notary  
Public, was examined and testified as  
follows:

# EXAMINATION BY MR. GREER:

Q. What is your name?

A. Allyson Ford.

Q. How long did you work for the  
Battery Park City Authority?

A. From 2010 through 2014.

Q. And what was your official job  
title?

A. I was employed as special counsel  
and then I was promoted to EEO officer in  
addition to the special counsel position about  
approximately a year later.

Q. What does that mean, EEO officer?

A. Equal opportunity officer.

Q. So would you field complaints from  
internal employees who might have a complaint  
about the workplace?

A. That is correct.

Q. Robert Serpico is a defendant, do

Page 6

1 Ford  
 2 you know Robert Serpico?  
 3 A. I do.  
 4 Q. Would you see him how often at  
 5 work, every day, once a month?  
 6 A. I was in the office every day. If  
 7 Mr. Serpico was in the office I would see him  
 8 if he was passing by in the hallway, at  
 9 meetings, or if I had a meeting with him.  
 10 Q. Did your job role require frequent  
 11 meetings with Mr. Serpico at work?  
 12 A. I would say not frequent.  
 13 Q. When you did have a meeting what  
 14 was the nature of it, how did it take place,  
 15 in his office, a meeting with other people?  
 16 A. It would depend upon the nature of  
 17 the meeting. If I can expand, if I had a  
 18 question in particular about for instance a  
 19 history at Battery Park City or a finance  
 20 issue I would go to Mr. Serpico. There were  
 21 occasions when there were general office  
 22 meetings or staff meetings where everyone at  
 23 the agency was present including Robert  
 24 Serpico. I had meetings with Mr. Serpico  
 25 pertaining to legal matters that involved

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1 Ford  
 2 was constructively terminated, although she  
 3 left of her own free will formally.  
 4 Q. Do you know who I am, and if so  
 5 when did you become aware of me?  
 6 A. I do know who you are and I became  
 7 aware of you very recently after I was first  
 8 hired through the blog that you do through  
 9 Battery Park City TV.  
 10 Q. Have you heard of Battery Park TV?  
 11 A. I have, not prior to my employment  
 12 at the Battery Park City Authority, but yes I  
 13 do.  
 14 Q. Do you know that I run Battery  
 15 Park TV?  
 16 A. I do.  
 17 Q. Were there any -- I report on a  
 18 wide variety of things, many of them on the  
 19 Battery Park City Authority, were any  
 20 inaccurate or misleading that come to mind?  
 21 MS. RIEGEL: Objection.  
 22 A. I am confused by the question.  
 23 Q. Was my reporting on Battery Park  
 24 TV in your opinion ever wrong?  
 25 MS. RIEGEL: Objection.

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1 Ford  
 2 finance issues. I had meetings with  
 3 Mr. Serpico about legal matters that concerned  
 4 EEO issues and personnel matters on occasion.  
 5 Q. You left the Battery Park City  
 6 Authority in 2014, why?  
 7 A. I was terminated in 2014.  
 8 Q. Did they give you a reason?  
 9 A. The reason was alleged leaking of  
 10 confidential information.  
 11 Q. To whom did you leak did they  
 12 allege?  
 13 A. There was actually no particular  
 14 person specified.  
 15 Q. Do you know of anyone else in the  
 16 BPCA around that time who was fired?  
 17 A. Yes.  
 18 Q. Who would that be?  
 19 A. Kirk Swanson was fired at that  
 20 time. I would characterize -- well that is my  
 21 opinion. Formally Kirk Swanson I knew of was  
 22 terminated.  
 23 Q. Do you know Nancy Harvey, was she  
 24 terminated?  
 25 A. I do. Nancy Harvey in my opinion

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1 Ford  
 2 A. In my opinion based upon the  
 3 matters that I was personally involved in I  
 4 would say no. I base that opinion on the  
 5 matters that I was personally involved in.  
 6 Q. Was Steven Greer or the, quote  
 7 unquote, blogger or Battery Park TV, were  
 8 those the topic of discussion amongst the  
 9 office at the Battery Park City Authority to  
 10 put it in like watercooler chat or were  
 11 they official conversations at official  
 12 meetings, did my name ever come up?  
 13 MS. RIEGEL: Objection.  
 14 A. Yes.  
 15 Q. Can you recall any specifics or  
 16 how that happened, how often that happened?  
 17 A. With regard to, quote unquote,  
 18 watercooler conversations, frequently, daily  
 19 as often as the blog came out.  
 20 With regard to formal meetings,  
 21 your blog and the topics of your blog were  
 22 mentioned at a formal meeting more than one  
 23 time.  
 24 Q. Who would be in attendance at that  
 25 formal meeting?

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1 Ford  
2 A. Full staff.  
3 Q. Would that include Robert Serpico?  
4 A. Yes.  
5 Q. Would that include Dennis Mehiel?  
6 A. Not at the meetings that I  
7 attended, Dennis was not there.  
8 Q. Would that include Brenda  
9 McIntyre?  
10 A. Yes.  
11 Q. Would that include Shari Hyman?  
12 A. I don't recall whether Shari was  
13 in attendance at the meetings that I am  
14 referring to.  
15 Q. Do you recall anyone, any of those  
16 people that you just mentioned that were  
17 discussing the blog, did any of those BPCA  
18 staff become angry over my reporting?  
19 A. In my opinion yes.  
20 Q. Did Robert Serpico become angry  
21 and can you elaborate if he did?  
22 A. In my opinion yes. The specific  
23 example I will refer to is a full staff  
24 meeting where Robert Serpico, this is not  
25 verbatim, this is based upon my firsthand

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1 Ford  
2 recollection, but Robert Serpico publicly  
3 announced that the blogs were not credible,  
4 that we should not read them, and that we  
5 should stay away from reading or looking at  
6 the blogs at all because they are not truthful  
7 nor helpful.  
8 Q. When did that occur, what year,  
9 what month approximately; was it 2013, was it  
10 2012?  
11 A. It was --  
12 Q. Was he acting president at the  
13 time?  
14 MS. TREMONTE: Objection.  
15 MS. RIEGEL: Objection.  
16 A. To the best of my recollection he  
17 was acting president at the time based upon  
18 the fact that he was heading the meeting and I  
19 do not recall Shari being there.  
20 Q. That helps.  
21 MR. TREMONTE: Objection.  
22 Q. Did Mr. Serpico, any other  
23 examples of Mr. Serpico getting upset with  
24 Battery Park TV or Steven Greer or the  
25 blogger?

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1 Ford  
2 A. Based on my recollection those  
3 incidents were not formal and would be  
4 characterized as, quote unquote, watercooler  
5 talk. But based upon those recollections,  
6 yes.  
7 Q. How would he become upset, would  
8 he yell, scream; how would he exhibit his  
9 anger?  
10 A. In my opinion it was a dismissal  
11 of the substance of the blog itself.  
12 Q. Do you recall any of the topics  
13 that upset him; stories about himself or the  
14 BPCA in general?  
15 MS. RIEGEL: Objection.  
16 A. I cannot recall.  
17 Q. Did Chairman CEO Dennis Mehiel  
18 ever show signs of anger or being upset about  
19 my reporting of Battery Park TV?  
20 A. Not to me, none that I witnessed  
21 personally.  
22 Q. Who is Linda Soriero?  
23 A. Linda Soriero was Bob Serpico's  
24 secretary.  
25 Q. Did you ever see Linda Soriero or

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1 Ford  
2 observe her being deceptive, lying or acting  
3 in a fraudulent way?  
4 MS. RIEGEL: Objection.  
5 MR. TREMONTE: Objection.  
6 A. No.  
7 Q. Who is Kirk Swanson?  
8 A. Kirk Swanson was the, to the best  
9 of my recollection of his title, the vice  
10 president of administration. I don't recall  
11 his title exactly.  
12 Q. And likewise did you ever see Kirk  
13 Swanson behave in a deceptive, lying or  
14 fraudulent way?  
15 A. No.  
16 Q. Who is Steve Rossi?  
17 A. Steve Rossi is one of the  
18 condominium owners. I did not have personal  
19 interaction with him.  
20 Q. Does he manage properties for the  
21 Howard Milstein Corporation?  
22 A. Yes.  
23 MR. TREMONTE: Objection.  
24 MS. RIEGEL: Objection.  
25 A. Yes.

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Ford

Q. Did you ever see or hear any Battery Park City Authority employee or board member meeting with Steve Rossi or other members of the Howard Milstein real estate family?

A. Not personally.

Q. Did you ever see Robert Serpico and Steve Rossi meet?

MR. TREMONTE: Objection.

A. Not personally.

Q. Not personally, but did you hear of it secondhand?

A. Yes.

MS. RIEGEL: Objection.

Q. How did you hear about it?

A. Through legal memoranda, through mentionings in legal meetings.

Q. Can you recall the year and time of the year when a legal meeting like that might have taken place that was evidence of their meetings, Steve Rossi and Serpico meeting?

A. During my employment.

Q. Was it while Mr. Serpico was

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Ford

acting president?

A. I do not recall.

Q. Was it before 2014?

A. Yes.

Q. Did you ever hear of Steven Greer, my issue of my personal residential apartment lease at the building at 200 Rector Place, did the topic of Steven Greer's apartment lease ever come up that you recall?

A. Yes.

Q. When did that place?

A. Prior to 2014.

Q. Can you describe who was talking about it, how it came up?

A. Based on my recollection it would be characterized as watercooler discussion with specific references to Mr. Serpico, Mr. Rossi, that's it.

Q. Did they mention that my lease was not going to be renewed?

A. I do not recall.

Q. Did they mention anything about me being evicted?

A. I do not recall.

Page 16

Ford

Q. So when they discussed my lease what were they discussing?

MR. TREMONTE: Objection.

A. Based on my recollection, again this was watercooler discussion, they were general employees, general discussions about the topic itself, and speculation as to what would happen in the event of such a situation occurring.

Q. They were discussing a potential eviction hypothetical?

MR. TREMONTE: Objection.

A. Again watercooler discussions, general people, the discussion about that topic took place.

Q. Can you list any of the people who were having these discussions, was it Mr. Serpico, was it Kevin McCabe?

MR. TREMONTE: Objection.

A. I do not recall.

Q. Do you recall any other instances of any other resident in Battery Park City who was a residential apartment renter, do you recall any other examples of staff of the BPCA

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Ford

discussing that type of matter, individual leases?

A. No.

Q. So you have testified that you have heard Mr. Serpico discussing me in 2013, speculation of what would happen if I were evicted. Do you believe --

MR. TREMONTE: Objection.

MS. RIEGEL: Objection.

Q. Do you believe -- can I finish the question please.

So did you ever see any E-mail communications in your various meetings -- you have already answered that. Scratch that.

Do you believe that Steve Rossi and Robert Serpico in your opinion worked together to make sure that my lease was not renewed?

MR. TREMONTE: Objection.

A. In my opinion I believe that that could be a possibility.

MS. TREMONTE: Move to strike the answer as non-responsive.

Q. Can you say yes or no in your

Page 18

1 Ford  
 2 opinion whether you think Mr. Serpico and Mr.  
 3 Rossi conspired or colluded to get me evicted  
 4 from my apartment?  
 5 MR. TREMONTE: Objection.  
 6 A. I cannot say conclusively.  
 7 MR. GREER: That is all I have.  
 8 MS. TREMONTE: Give us two  
 9 minutes. Off the record.  
 10 (Recess taken.)  
 11 EXAMINATION BY  
 12 MR. TREMONTE:  
 13 Q. My name is Michael Tremonte, I  
 14 represent the BPCA and Mr. Serpico.  
 15 We have not met; correct?  
 16 A. No we have not.  
 17 Q. We served you recently with a  
 18 subpoena, are you aware of that?  
 19 A. I am here, yes.  
 20 Q. We subpoenaed documents from you,  
 21 are you aware of that?  
 22 A. No.  
 23 Q. You did receive the subpoena that  
 24 we served on you from the Battery Park City  
 25 Authority and Mr. Serpico; is that correct?

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1 Ford  
 2 would?  
 3 A. Yes.  
 4 Q. Have you seen that before?  
 5 A. I want to say yes, but I have to  
 6 see the other one honestly to compare it. I  
 7 want to say yes.  
 8 Q. So as you sit here right now you  
 9 are not sure?  
 10 A. I am not sure, but if I could see  
 11 the other one, but unfortunately I don't have  
 12 it, but it is possible I did, but I honestly  
 13 don't recall. The appearance for this is -- I  
 14 may have seen this before, yes.  
 15 Q. If you could turn to the last page  
 16 which is numbered at the bottom page 2, it is  
 17 the last page of the document, it's the second  
 18 page of the rider at the end, so really the  
 19 last page of the document.  
 20 A. Yes.  
 21 Q. Directing your attention to where  
 22 it says request for production, do you see  
 23 that?  
 24 A. Yes.  
 25 Q. The first request references

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1 Ford  
 2 A. I received a subpoena, yes.  
 3 Q. When did you receive the subpoena?  
 4 A. It was -- actually I received two  
 5 subpoenas, both secondhand. I received one  
 6 subpoena from my husband who I am separated  
 7 from, and that was late last week, it went to  
 8 his address. And then I received a second  
 9 subpoena from my job, the Liro Group, which  
 10 was sent to them with a different date and a  
 11 different location mentioned, both of which I  
 12 have with me, and I received that on Monday.  
 13 Q. Let me first mark this for  
 14 identification as Defendant's Exhibit 1,  
 15 subpoena.  
 16 (Defendant's Exhibit 1, subpoena,  
 17 marked for identification, as of this  
 18 date.)  
 19 Q. So I am going to show you what was  
 20 marked for identification as Defendant's  
 21 Exhibit 1, and I am handing a copy also to Mr.  
 22 Greer. Take a minute to look at that and let  
 23 me know when you are done?  
 24 A. Okay.  
 25 Q. Keep that in front of you if you

Page 21

1 Ford  
 2 documents and communications concerning  
 3 meetings between Robert Serpico and Steve  
 4 Rossi.  
 5 Do you see that?  
 6 A. Yes.  
 7 Q. Do you have any such documents in  
 8 your possession?  
 9 A. I do not.  
 10 Q. And by possession I mean broadly  
 11 possession, custody or control?  
 12 A. I do not.  
 13 Q. Turning to the second numbered  
 14 paragraph there it says documents and  
 15 communications concerning the non-renewal of  
 16 plaintiff's lease and plaintiff's eviction  
 17 from 200 Rector Place.  
 18 Do you see that?  
 19 A. Yes.  
 20 Q. Do you have any such documents?  
 21 A. I do not.  
 22 Q. Number 3, all documents and  
 23 communications with plaintiff concerning  
 24 plaintiff's lawsuit.  
 25 Do you have any such documents?



1 Ford  
2 A. Plaintiff meaning Steven Greer?  
3 Q. I am sorry, good question.  
4 Yes, plaintiff meaning Steven  
5 Greer?  
6 A. I do not.  
7 Q. Have you ever communicated -- you  
8 can set that aside if you like -- have you  
9 ever communicated with Mr. Greer about this  
10 lawsuit?  
11 A. Yes.  
12 MR. GREER: Objection.  
13 Q. So for example you just met with  
14 Mr. Greer a few minutes ago and discussed the  
15 lawsuit; is that correct?  
16 MR. GREER: Objection.  
17 A. Yes.  
18 Q. What did you discuss?  
19 MR. GREER: Objection.  
20 A. Location of where the deposition  
21 was going to take place. Postponement of the  
22 deposition based on my eye infection.  
23 Inability to postpone it. That is about it.  
24 Q. Anything else?  
25 A. General discussion about my

1 Ford  
2 willingness to tell only what I knew, and  
3 whether or not it was relevant was out of my  
4 control, so I would tell the truth of what I  
5 knew.  
6 Q. Did you discuss in advance of your  
7 testimony today what you were going to testify  
8 to?  
9 A. No.  
10 MR. GREER: Objection.  
11 A. No.  
12 Q. You met with Mr. Greer just a few  
13 minutes ago during the break; correct?  
14 A. Yes.  
15 Q. What did you discuss during the  
16 break?  
17 A. How I knew Deborah Riegel and  
18 liked her very much, and I hoped that it would  
19 not be a problem, and that I thought you all  
20 should know my current title of what I am  
21 currently doing for the record.  
22 Q. What are you currently doing and  
23 what is your title?  
24 A. Associate vice president and  
25 senior counsel at the Liro Group.

1 Ford  
2 Q. When did you begin working in that  
3 position?  
4 A. 2015.  
5 Q. Did you take that position  
6 immediately after you left Battery Park City  
7 Authority?  
8 A. I took that position eleven months  
9 after I left Battery Park City Authority.  
10 Q. Were you employed during those  
11 eleven months?  
12 A. No I was not.  
13 Q. Getting back to communications  
14 with Dr. Greer about this lawsuit, did you  
15 communicate at all by E-mail?  
16 A. No.  
17 Q. Did you communicate at all by any  
18 other means?  
19 A. Yes.  
20 Q. How else did you communicate?  
21 A. Via text.  
22 Q. Tell us about those texts?  
23 A. I asked for the location of where  
24 the deposition was going to take place.  
25 Confirmed that I had to actually come to the

1 Ford  
2 deposition. And that I was only going to tell  
3 the truth of what I knew which may or may not  
4 be helpful.  
5 Q. Did you talk to anybody else about  
6 your testimony here today?  
7 A. No.  
8 Q. No one else in your family?  
9 A. My father.  
10 Q. What did you discuss with your  
11 father?  
12 A. That I had to appear per a  
13 subpoena to testify probably based on what I  
14 knew about Battery Park City, and the subject  
15 of the subpoena or the deposition was Robert  
16 Serpico. That Battery Park City, in  
17 particular Robert Serpico, Brenda, Shari, the  
18 administration that I worked under were people  
19 who were untruthful and had done very bad  
20 things to many people, and that I was not  
21 surprised that I was being called for a  
22 subpoena -- per subpoena for this deposition,  
23 and that I didn't want to go because I left it  
24 behind me. But that I would certainly avail  
25 myself of these types of hearings to give

1 Ford  
2 whatever truthful information I could because  
3 I do believe that there has been quite a bit  
4 of wrongdoing toward many, many, many people.  
5 However that is not particularly relevant, but  
6 that was a topic of my discussion.

7 Q. Anything else?

8 A. No.

9 Q. Did you talk to a lawyer in  
10 anticipation of your testimony?

11 A. No.

12 Q. Let me finish my question, it  
13 would be easier for the court reporter to get  
14 it down.

15 Did you talk to any former BPCA  
16 employees in anticipation of your testimony  
17 today?

18 A. Yes.

19 Q. What former BPCA employees did you  
20 speak to?

21 A. Kirk Swanson.

22 Q. How many times did you speak to  
23 Mr. Swanson?

24 A. I did not speak to Mr. Swanson, it  
25 was via text.

1 Ford

2 Q. Describe those communications to  
3 us?

4 A. I got a subpoena from Steven  
5 Greer, I don't know how to get in touch with  
6 me, do I need to really go. Can you get in  
7 touch with Steven so I can confirm that I have  
8 to go.

9 Q. Did Mr. Swanson respond to those  
10 texts?

11 A. He did.

12 Q. How did he respond?

13 A. I called Steven, he will be  
14 calling you.

15 Q. So Mr. Swanson texted to you that  
16 he had called Steven Greer and that Steven  
17 Greer would be calling you?

18 A. Correct.

19 Q. Anything else?

20 A. No.

21 Q. Did you talk to Mr. Swanson by  
22 phone?

23 A. No.

24 Q. Did you talk to him in person?

25 A. As I stated I spoke to him via

1 Ford  
2 text.

3 Q. And not by E-mail?

4 A. Not to my recollection.

5 RQ Q. I would ask that you voluntarily  
6 produce those text messages to us and any  
7 E-mails you may have, for example you are not  
8 recalling now, we will serve you with a  
9 subpoena to that effect as well, but we can  
10 avoid that by voluntary production.

11 Did you speak to any other former  
12 BPCA employees about your testimony?

13 A. No.

14 Q. Have you had any other  
15 conversations with Mr. Swanson about Mr.  
16 Greer's lawsuit?

17 A. Mr. Greer's lawsuit?

18 Q. Yes.

19 A. No.

20 Q. Have you spoken to any other  
21 former BPCA employees about Mr. Greer's  
22 lawsuit?

23 A. No.

24 Q. Did you speak to any current BPCA  
25 employees in anticipation of your testimony

1 Ford

2 today?

3 A. No.

4 Q. Have you ever spoken to any  
5 current BPCA employee about Mr. Greer's  
6 lawsuit?

7 A. No.

8 Q. When did you first learn of Mr.  
9 Greer; when did he first come to your  
10 knowledge?

11 MR. GREER: Objection. That is  
12 not my name.

13 A. Between 2010 and 2011 when I first  
14 was employed at BPCA.

15 Q. How did you first learn about Dr.  
16 Greer?

17 A. To the best of my recollection  
18 reading a blog in the Battery Park City TV.

19 Q. How did you come to read those  
20 blogs?

21 A. To the best of my recollection the  
22 authority, Battery Park City Authority, had  
23 regular newspapers laying around and the blog  
24 was in them and people would talk about them.

25 Q. During the course of your



1 Ford  
2 employment with BPCA did Mr. Greer ever  
3 attempt to contact you?  
4 MR. GREER: Objection. That is  
5 not my name.  
6 A. Not to my recollection.  
7 Q. Did Dr. Greer ever try to call you  
8 during the time that you were employed by  
9 BPCA?  
10 A. No.  
11 Q. Were you aware of Dr. Greer trying  
12 to contact other people at the BPCA when you  
13 were employed there?  
14 MR. GREER: Objection.  
15 A. No.  
16 Q. Did you ever --  
17 MR. GREER: Objection. You just  
18 said something as if it were fact when it  
19 is not fact.  
20 Q. Did you ever contact Dr. Greer  
21 during the course of your employment at BPCA?  
22 A. No.  
23 Q. Actually let me ask that a  
24 different way.  
25 During the time when you were

1 Ford  
2 employed at the BPCA did you ever contact Dr.  
3 Greer?  
4 A. No.  
5 Q. Did you ever provide Dr. Greer  
6 with any documents at any time?  
7 A. No.  
8 Q. Did you ever provide Dr. Greer  
9 with information of any kind at any time?  
10 MR. TREMONTE: Objection.  
11 Redundant.  
12 A. No.  
13 Q. During the time that you were  
14 employed at the BPCA were you aware that any  
15 other BPCA employees were supplying  
16 information of any kind to Dr. Greer?  
17 A. It is not a yes or no answer. So  
18 to the best of my recollection there was lots  
19 of watercooler talk about employees who have  
20 consistently supplied Mr. Greer with  
21 information about the comings and goings of  
22 Battery Park City Authority life, experiences.  
23 These discussions about employees who were  
24 providing that information predates my  
25 employment.

1 Ford  
2 So to the best of my recollection  
3 what I recall hearing from employees at  
4 Battery Park City Authority while I was  
5 employed was that long before my employment  
6 there have always been people who have been  
7 reporting incidents that have occurred at  
8 Battery Park City Authority to Steven Greer.  
9 Q. What specific names if any came up  
10 as individuals who had supplied information to  
11 Dr. Greer?  
12 A. That would only be speculation.  
13 Q. Well --  
14 A. I don't have any conclusive  
15 answer.  
16 Q. I am not asking you for  
17 speculation, I am just asking you whether or  
18 not in this watercooler talk that you  
19 participated in to some extent if any specific  
20 names came up as to names of people who have  
21 supposedly supplied information to Dr. Greer?  
22 A. Robert Serpico, that is the only  
23 one that comes to mind.  
24 Q. What did you hear about Robert  
25 Serpico supplying information to Dr. Greer?

1 Ford  
2 A. Again to the best of my  
3 recollection, and again under the premise that  
4 this was watercooler talk and that I do not  
5 have firsthand knowledge of Robert Serpico  
6 telling me that he did this, that what I heard  
7 was that Robert Serpico ironically was a,  
8 quote unquote, mole, and was providing  
9 information to Steven Greer long before my  
10 employment at BPCA, and that he was a source  
11 of information, and that was what I heard.  
12 Q. Was there any discussion in these  
13 watercooler conversations about the type of  
14 information that was supplied to Dr. Greer by  
15 Robert Serpico?  
16 A. To the best of my recollection the  
17 topics would include the topics that were  
18 reported on by Steven Greer in his blog.  
19 Q. Such as which topics?  
20 A. For example the alleged scandals  
21 with Wilson Kimball and the former president,  
22 I am really having to dial back, Jim  
23 Cavanaugh. That is what I can remember.  
24 Q. You don't remember any other such  
25 topics?

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1 Ford  
2 A. Not with regard to Robert Serpico  
3 personally being the supplier of the  
4 information.  
5 Q. Were others rumored to be  
6 suppliers of information that you can remember  
7 other than Robert Serpico?  
8 A. Yes, but I don't have any specific  
9 names.  
10 Q. You don't recall?  
11 A. No.  
12 Q. Just back to Robert Serpico, who  
13 said during these watercooler conversations  
14 that Robert Serpico had supplied information  
15 to Dr. Greer?  
16 A. Many Battery Park City  
17 Conservatory people, employees, as well as  
18 Battery Park City Authority people. I do not  
19 recall who.  
20 Q. You don't recall the name of any  
21 Battery Park City Conservatory employees who  
22 told you about Bob Serpico's supplying  
23 information to Dr. Greer?  
24 A. I don't recall the names.  
25 Q. And you don't recall the names of

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1 Ford  
2 any Battery Park City Authority employees who  
3 told you that Robert Serpico had supplied  
4 information to Dr. Greer?  
5 A. No.  
6 Q. To your knowledge did Kirk Swanson  
7 ever supply any type of information to Dr.  
8 Greer at any time?  
9 A. I don't recall. For Mr. Greer I  
10 don't recall.  
11 Q. Did Kirk Swanson ever tell you  
12 that he had supplied information of any kind  
13 to Dr. Greer?  
14 A. No.  
15 Q. Are you aware of Linda Soriero  
16 ever supplying any information to Dr. Greer?  
17 A. No.  
18 Q. When you were employed at the  
19 Authority did you speak with Linda Soriero  
20 from time to time?  
21 A. Yes.  
22 Q. What did you talk to Ms. Linda  
23 Soriero about?  
24 A. General conversations setting up  
25 meetings. How she was. Particular meetings

Page 36

1 Ford  
2 she had with me about EEO complaints.  
3 Q. Did you ever talk to Ms. Soriero  
4 when she was employed by the BPCA about Dr.  
5 Greer; when I say about Dr. Greer, I mean  
6 about Dr. Greer or his blog or any business or  
7 entity that he is associated with?  
8 A. No.  
9 Q. Just to be clearer still let me  
10 ask the question more broadly.  
11 Have you ever discussed Dr. Greer  
12 in any way, shape or form with Linda Soriero?  
13 A. Not that I can recall.  
14 Q. Did you ever exchange an E-mail  
15 with Linda Soriero about Dr. Greer or his  
16 lawsuit or his blogs?  
17 A. No.  
18 Q. Did you ever communicate with,  
19 aside from the text exchange that you  
20 testified about earlier, did you ever talk to  
21 Kirk Swanson about Dr. Greer or his blogs or  
22 his business?  
23 A. Yes.  
24 Q. Tell us about those conversations?  
25 A. General conversations about the

Page 37

1 Ford  
2 credibility of the content and the questioning  
3 or guessing of where the information was  
4 coming from. Who might have supplied the  
5 information. General conversations about the  
6 observations of staff who were in clear  
7 objection of the exposure of the information.  
8 General conversations about their reaction to  
9 the information that was being supplied to the  
10 blog. General conversations and speculations  
11 about why there was such anger and attempts to  
12 discredit the information coming through the  
13 blogs by those who were being accused of  
14 wrongdoing in the blogs. Those were the  
15 topics.  
16 Q. When you were working at BPCA did  
17 Kirk Swanson ever indicate to you that he was  
18 in contact with Dr. Greer?  
19 A. I don't recall.  
20 Q. You testified earlier that you had  
21 a text exchange with Kirk Swanson of a  
22 practical nature where you were trying to get  
23 in touch with Dr. Greer and you were seeking  
24 his assistance; is that correct?  
25 A. Correct.

1 Ford

2 Q. Why did you reach out to him, why  
3 did you think he could help you to connect  
4 with Dr. Greer?

5 A. Because I am aware of Kirk's  
6 lawsuit against BPCA, and I am aware of other  
7 people's lawsuits against BPCA, and Kirk and I  
8 are in communication and he would naturally be  
9 the person from BPCA that I would call about  
10 this because he is the person that I speak  
11 with -- if I speak with anyone from BPCA  
12 outside of the topics of BPCA it would be  
13 Kirk.

14 MR. GREER: I just need to  
15 interject. I called the witness, Ms.  
16 Ford, and said that this process would  
17 last less than an hour. It is now 1:52  
18 and she has an appointment for a medical  
19 doctor, so you should probably be less  
20 redundant and get to the point.

21 Q. You say you are aware that Kirk  
22 Swanson has a lawsuit against the BPCA. Just  
23 generally what is that about; what is your  
24 understanding of the nature of his lawsuit?

25 A. Grievances against BPCA.

1 Ford

2 Q. But his lawsuit and the grievances  
3 against the BPCA don't have anything to do  
4 with Dr. Greer; is that correct?

5 A. Correct.

6 Q. Again why did you think based on  
7 the fact that Kirk Swanson is suing the BPCA  
8 on stuff that has nothing to do with Dr.  
9 Greer, that he would be able to help you get  
10 in touch with Dr. Greer?

11 A. Well the common denominator with  
12 most of these grievances somehow ties back to  
13 in general, and when I say most of these  
14 grievances I mean the plurality of people that  
15 have grievances against the Battery Park City  
16 Authority, somehow in some way, shape or form  
17 are connected in some way to the blog and  
18 information out of the blog. So I assume that  
19 Kirk might have an ability to connect me with  
20 Mr. Greer.

21 MR. GREER: I need to ask a  
22 question about this evidence you entered,  
23 the subpoena before we run out of time.

24 If you can go back to this --

25 MS. TREMONTE: When I am done --

1 Ford

2 MR. GREER: Excuse me, we are  
3 running out of time.

4 MS. TREMONTE: We are not running  
5 out of time, the witness will stay as  
6 long as in necessary to answer our  
7 questions.

8 MR. GREER: No she will not.

9 MS. TREMONTE: She certainly will.

10 MR. GREER: No. You can leave  
11 whenever you want.

12 THE WITNESS: Can we move it here,  
13 I am willing to answer questions, but can  
14 we move it along here.

15 MR. GREER: I need to ask you  
16 about this subpoena if you look here,  
17 these documents. Did you -- they are  
18 asking for meetings, they are asking  
19 for -- earlier in your testimony you said  
20 that you recall seeing these. Do you  
21 recall seeing any of these documents in  
22 the course of your meetings as counsel or  
23 did they exist, did you --

24 THE WITNESS: Not in my meetings.

25 MR. GREER: Do you recall seeing

1 Ford

2 documents that mentioned 200 Rector  
3 Place, 35-F, at all; you don't have them  
4 in your possession, but do you recall  
5 seeing them?

6 THE WITNESS: Addresses frequently  
7 appeared in many legal documents, none  
8 with regard to the topic of your  
9 particular lawsuit.

10 MR. GREER: And you previously  
11 testified today that you did see  
12 evidence, I forgot how you said it, but  
13 in the course of your meeting you said  
14 you saw documents that showed that  
15 Serpico and Rossi were meeting; is that  
16 correct?

17 THE WITNESS: I recall documents  
18 being discussed. I didn't personally see  
19 documents with regard to that, to the  
20 topic of Bob Serpico and Steve Rossi  
21 meeting.

22 MR. GREER: And I asked them to be  
23 produced from the defendants and they  
24 have not produced them, but you believe  
25 they exist; is that correct?

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1 Ford  
 2 MS. RIEGEL: Objection.  
 3 THE WITNESS: I heard of matters  
 4 discussed in relation to those topics. I  
 5 have not seen those documents.  
 6 MR. GREER: You said a few minutes  
 7 ago, you said there was quote, quite a  
 8 bit of wrongdoing at the BPCA. What did  
 9 you mean by that?  
 10 MS. RIEGEL: Objection.  
 11 THE WITNESS: It has been alleged  
 12 by many employees that they have been the  
 13 subject of ill behavior by Battery Park  
 14 City Authority.  
 15 MR. GREER: For example were they  
 16 firing people who were just simply doing  
 17 their job and investigating sexual  
 18 harassment charges?  
 19 MS. RIEGEL: Objection.  
 20 MR. TREMONTE: Objection. This is  
 21 beyond the scope of permissible  
 22 discovery. In fact Judge Cott has  
 23 specifically directed you not to take  
 24 discovery on this topic and related  
 25 topics in connection with this

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1 Ford  
 2 proceeding.  
 3 MR. GREER: Why were you fired,  
 4 what were you investigating that made  
 5 them fire you?  
 6 MR. TREMONTE: Objection. Same  
 7 objection.  
 8 MR. GREER: You are allowed to  
 9 answer.  
 10 THE WITNESS: I was terminated for  
 11 allegedly leaking confidential  
 12 information relating to an investigation.  
 13 MR. GREER: That is all I have.  
 14 You are my witness, you have a medical  
 15 meeting, you are free to leave. They  
 16 have no control over you. If they want  
 17 to continue questions they will have to  
 18 take it up with the judge.  
 19 MS. RIEGEL: I do have some  
 20 questions, but I will keep them brief.  
 21 EXAMINATION BY  
 22 MS. RIEGEL:  
 23 Q. Allyson we have met before;  
 24 correct?  
 25 A. Yes.

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1 Ford  
 2 Q. Can you describe how we met  
 3 before?  
 4 A. While employed at Battery Park  
 5 City Authority in my capacity as a member of  
 6 the legal team, special counsel, we worked on  
 7 matters, real estate matters regarding  
 8 properties and real estate issues regarding  
 9 properties and legal issues at Battery Park  
 10 City.  
 11 Q. During your tenure you were  
 12 familiar, if you are not still, you were  
 13 familiar with the ground lease structure as  
 14 relates to Battery Park City condominiums,  
 15 were you not?  
 16 A. Yes.  
 17 Q. Do you recall the process for  
 18 enforcement of deficiencies by individual  
 19 condominium unit owners, in general?  
 20 A. Vaguely, yes.  
 21 Q. And is it fair to say that  
 22 pursuant to the ground leases both Battery  
 23 Park City and the individual condominiums had  
 24 differing enforcement rights and capacities  
 25 with respect to defaulting condominium unit

Page 45

1 Ford  
 2 owners?  
 3 MR. GREER: Objection.  
 4 Irrelevant. Condominium owners have  
 5 nothing do with residential renters.  
 6 A. I don't recall specifically. But  
 7 in general yes I do recall. But I don't  
 8 recall specifically.  
 9 Q. The condominiums paid ground rent  
 10 and pilot to Battery Park City Authority; is  
 11 that correct?  
 12 A. Yes.  
 13 Q. And that money was collected by  
 14 the individual condominiums; correct?  
 15 A. Correct.  
 16 Q. If a condominium unit owner  
 17 defaulted in that obligation as well as it's  
 18 obligation to the condominium, both the  
 19 Authority and the condominium would be seeking  
 20 payment; is that correct?  
 21 MR. GREER: Objection. Completely  
 22 far afield, has nothing to do with my  
 23 residential renting lease. She is trying  
 24 to imply that powers over condo owners  
 25 have anything to do whatsoever with a

Page 46

1 Ford  
 2 renter.  
 3 MS. RIEGEL: Dr. Greer I am going  
 4 to remind you that Judge Cott  
 5 specifically directed that you simply  
 6 state that you have an objection without  
 7 colloquy, and since you seem very  
 8 concerned about getting Ms. Ford out of  
 9 here quickly you would accomplish that by  
 10 simply noting your objection and letting  
 11 us move on.  
 12 A. Could you repeat the question.  
 13 Q. Please read back the question.  
 14 (Record read.)  
 15 A. To the best of my recollection,  
 16 yes.  
 17 Q. Are you familiar with Milford  
 18 Management?  
 19 A. Yes.  
 20 Q. And did Milford Management during  
 21 your tenure manage various condominiums within  
 22 Battery Park City?  
 23 A. Yes.  
 24 Q. And as managing agent for those  
 25 condominiums do you recall that Milford

Page 47

1 Ford  
 2 Management was involved in recovery of  
 3 deficiencies from defaulting condominium unit  
 4 owners?  
 5 MR. GREER: Objection. Completely  
 6 irrelevant to this case. Badgering of  
 7 the witness. You are free to leave for  
 8 your medical meeting.  
 9 A. In general yes.  
 10 Q. You testified earlier you know  
 11 that Steve Rossi is employed by Milford  
 12 Management; is that correct?  
 13 A. Yes.  
 14 Q. And in that capacity do you recall  
 15 that Mr. Rossi was involved in collections  
 16 with respect to various condominium owners'  
 17 deficiencies?  
 18 A. I don't recall.  
 19 Q. If Mr. Rossi was involved in  
 20 collecting deficiencies from condominium  
 21 owners -- withdrawn.  
 22 MR. GREER: Objection.  
 23 Hypothetical.  
 24 Q. Mr. Serpico on the Battery Park  
 25 City side was involved in collection of

Page 48

1 Ford  
 2 deficiencies to Battery Park City from the  
 3 condominiums, was he not?  
 4 A. Yes.  
 5 Q. So if there were deficiencies with  
 6 respect to condominiums Mr. Serpico on one  
 7 side and Mr. Rossi on the other side would be  
 8 involved on a business level in collecting  
 9 those deficiencies, would they not?  
 10 A. Yes.  
 11 Q. And that would necessitate that  
 12 they communicate with each other, would it  
 13 not?  
 14 A. Yes.  
 15 Q. And do you recall seeing me in  
 16 Battery Park City's offices from time to time  
 17 during your tenure there?  
 18 A. Yes.  
 19 Q. Do you recall the purpose of those  
 20 meetings generally?  
 21 A. Deficiency related.  
 22 Q. Go ahead.  
 23 A. Related to matters of units with  
 24 deficiencies.  
 25 MS. RIEGEL: I have no other

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1 Ford  
 2 questions.  
 3 MS. TREMONTE: Just a handful.  
 4 EXAMINATION BY  
 5 MR. TREMONTE:  
 6 Q. You testified earlier that, and  
 7 you can tell me if I have this right, that you  
 8 were involved in meetings where memos were  
 9 discussed that referenced meetings between on  
 10 the one hand Bob Serpico and on the other hand  
 11 Milstein people; is that correct?  
 12 A. Yes.  
 13 Q. Do you recall what the subject  
 14 matter of those memos was?  
 15 A. I can't recall.  
 16 Q. Do you recall any discussion as to  
 17 the reason why Bob Serpico was meeting with  
 18 Milstein people on the occasions described in  
 19 the memos?  
 20 A. I can't recall.  
 21 MR. TREMONTE: Nothing further.  
 22 MR. GREER: One final question.  
 23 EXAMINATION BY  
 24 MR. GREER:  
 25 Q. If Mr. Serpico and Mr. Rossi were



1 Ford  
2 meeting for official business relating to  
3 delinquent condominium owners would it be  
4 standard in your opinion as a lawyer for the  
5 Battery Park City Authority for them to meet  
6 at a coffee house rather than in the BPCA  
7 offices?

8 MS. RIEGEL: Objection.

9 A. I don't know.

10 Q. Do you find it strange that they  
11 met frequently one-on-one in coffee shops?

12 MS. RIEGEL: Objection.

13 A. I don't know.

14 MR. GREER: That is all I have.  
15 It is 2:05.

16 (Time noted: 2:05 p.m.)

17 MS. TREMONTE: If we can reopen  
18 the record for a minute.

19 So Dr. Greer can speak to the  
20 details, but we note for the record that  
21 there were depositions scheduled,  
22 additional depositions scheduled for  
23 today, both noticed by Dr. Greer. The  
24 first which was supposed to happen, or  
25 supposed to take place at 10 a.m., Nancy

1 Ford  
2 Harvey, and the second deposition that  
3 was supposed to take place but which  
4 apparently is not was scheduled for 3  
5 p.m., and that would have been the  
6 deposition of Linda Soriero also noticed  
7 by Dr. Greer, and Dr. Greer can make a  
8 record as to his attempts to communicate  
9 with them, to serve them, and what he  
10 heard about their attendance.

11 MR. GREER: Ms. Soriero has a  
12 lawyer now and he was going to attend the  
13 meeting, and he at the last minute  
14 claimed he was ill with something that  
15 seems like what Mr. Tremonte has, an  
16 upper respiratory infection, and so they  
17 called it off. But we are going to do  
18 written depositions instead. That's it.

19  
20 ALLYSON FORD

21  
22 Subscribed and sworn to before me  
23 this \_\_\_\_ day of \_\_\_\_\_, 2017  
24  
25

1  
2 C E R T I F I C A T E  
3 STATE OF NEW YORK )  
4 : ss.  
5 COUNTY OF NEW YORK )

6  
7 I, Philip Rizzuti, a Notary  
8 Public within and for the State of New  
9 York, do hereby certify:

10 That ALLYSON FORD, the witness  
11 whose deposition is hereinbefore set forth,  
12 was duly sworn by me and that such  
13 deposition is a true record of the  
14 testimony given by the witness.

15 I further certify that I am not  
16 related to any of the parties to this  
17 action by blood or marriage, and that I am  
18 in no way interested in the outcome of this  
19 matter.

20 IN WITNESS WHEREOF, I have  
21 hereunto set my hand this 24th day of  
22 April, 2017.

23  
24 PHILIP RIZZUTI  
25

1  
2 ----- I N D E X -----  
3 WITNESS EXAMINATION BY PAGE  
4 ALLYSON FORD Mr. Greer 5  
5 Mr. Tremonte 18, 49  
6 Ms. Riegel 43, 49  
7

8 ----- INFORMATION REQUESTS -----  
9 DIRECTIONS: None  
10 RULINGS: None  
11 TO BE FURNISHED: None  
12 REQUESTS: 28  
13 MOTIONS: None  
14

15 ----- EXHIBITS -----  
16 Defendant's Exhibit 1, subpoena, 19  
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25



NAME OF CASE: Greer v. Mehiel, et al.  
DATE OF DEPOSITION: April 12, 2017  
NAME OF WITNESS: ALLYSON FORD  
PAGE LINE FROM TO

[illegible]

Subscribed and sworn to before me  
this \_\_\_\_ day of \_\_\_\_\_, 2017.

(Notary Public)      My Commission Expires:

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